

EXHIBIT D

**Deposition of Pamela Worley
Taken on March 25, 2003**

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1 Q Tell me about that please.

2 A Well, the business was declining and we were
3 downsizing and we needed technical consultants. We
4 needed good employees to be technical consultants and
5 we approached Jennifer to see if she wanted to do
6 that.

7 Q Did Tom Moore talk to Jennifer Mazzarello
8 about that or did he say he wanted to do it without
9 your being present or how did that go?

10 A I don't recall exactly. I mean I believe I
11 had a discussion with Jennifer about it, mentioned it
12 to her.

13 Q Was Tom Moore present?

14 A No.

15 Q What was Jennifer's reaction?

16 A I don't recall. Neutral.

17 Q Do you recall Tom Moore asking to meet with
18 Jennifer outside of your presence?

19 A No.

20 Q Do you recall Jennifer Mazzarello telling
21 you that Tom Moore had indicated he wanted to meet

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1 Ms. Mazzarello what she would do if she lost her job?

2 A No.

3 Q Is it true that a transfer from an account
4 manager to a technical consultant position is a
5 demotion?

6 A No.

7 Q Is it considered a lateral move?

8 A You would stay within grade, meaning you
9 would be an A4, you would still be an A4.

10 Q So considered a lateral move?

11 A Yes.

12 Q Not a demotion?

13 A No.

14 Q Not a promotion?

15 A No.

16 Q Had there been any other individuals that
17 you're aware of that had been transferred over to a
18 technical consultant's position and subsequently laid
19 off or terminated?

20 A No, I don't recall.

21 Q Were you a participant in any discussions